

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY, LLC, <i>et al.</i> , ¹	§	Case No. 20-33948 (MI)
	§	
Debtors.	§	(Jointly Administered)
	§	

**NOTICE OF FILING OF AMENDED EXHIBIT A TO OBJECTION OF XTO OFFSHORE, INC.,
HHE ENERGY COMPANY, AND XH LLC TO THE DISCLOSURE STATEMENT FOR THE
JOINT CHAPTER 11 PLAN OF FIELDWOOD ENERGY, LLC AND
ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE THAT, on February 22, 2021, XTO Offshore, Inc., HHE Energy Company, and XH LLC (collectively, "XTO") filed their Objection (the "XTO Objection") [Docket No. 900] to the *Disclosure Statement for the Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* (the "Disclosure Statement") [Docket No. 723] with respect to the *Joint Chapter 11 Plan of Fieldwood Energy, LLC and its Affiliated Debtors* (the "Joint Plan") [Docket No. 722]. Attached as Exhibit A to the XTO Objection was a copy of a schedule reflecting the P50, P70 and P90 estimates from BSEE to decommission certain of the XTO Leases (as those terms are defined in the Objection) sought to be abandoned by the Debtors.

After filing its Objection, XTO identified certain additional leases among the Abandoned Properties for which XTO may appear in the chain of title. XTO also identified an error in the calculation formula in its original Exhibit A. As a result, XTO hereby files the attached Amended Exhibit A, which replaces the Exhibit A originally attached to the XTO Objection.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

DATED: March 12, 2021

Respectfully Submitted,

/s/ J. Robert Forshey

J. Robert Forshey

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ATTORNEYS FOR XTO OFFSHORE, INC., HHE
ENERGY COMPANY, AND XH LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all parties receiving electronic notice via the Court's CM/ECF system on March 12, 2021.

/s/ J. Robert Forshey

J. Robert Forshey

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Amended Exhibit “A”

Fieldwood BSEE Decommissioning Estimates

Lease	Type	P50	P70	P90	Deterministic
G01027	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$576,742.00
	Platform Decom	\$6,756,294.00	\$7,930,346.00	\$9,666,575.00	\$0.00
	Platforms Site Clear Cost	\$424,164.00	\$689,424.00	\$1,358,616.00	\$0.00
	Wells Decom	\$9,191,637.00	\$11,697,692.00	\$15,325,689.00	\$0.00
	Subtotal for Lease	\$16,372,095.00	\$20,317,462.00	\$26,350,880.00	\$576,742.00
G01028	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$294,659.00
	Platform Decom	\$4,351,509.00	\$4,801,059.00	\$5,476,222.00	\$0.00
	Platforms Site Clear Cost	\$141,388.00	\$229,808.00	\$452,872.00	\$0.00
	Wells Decom	\$8,484,275.00	\$10,863,733.00	\$14,308,833.00	\$0.00
	Subtotal for Lease	\$12,977,172.00	\$15,894,600.00	\$20,237,927.00	\$294,659.00
G01029	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$1,343,346.00
	Platform Decom	\$5,933,847.00	\$6,834,009.00	\$8,165,851.00	\$0.00
	Platforms Site Clear Cost	\$282,776.00	\$459,616.00	\$905,744.00	\$0.00
	Wells Decom	\$3,931,686.00	\$5,242,446.00	\$7,140,661.00	\$0.00
	Subtotal for Lease	\$10,148,309.00	\$12,536,071.00	\$16,212,256.00	\$1,343,346.00
G01172	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$321,506.00
	Platform Decom	\$7,585,809.00	\$8,937,645.00	\$10,907,682.00	\$0.00
	Platforms Site Clear Cost	\$424,164.00	\$689,424.00	\$1,358,616.00	\$0.00
	Wells Decom	\$9,943,428.00	\$12,613,358.00	\$16,480,055.00	\$0.00
	Subtotal for Lease	\$17,953,401.00	\$22,240,427.00	\$28,746,353.00	\$321,506.00
G01216	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$1,101,083.00
	Platform Decom	\$7,294,628.00	\$8,194,790.00	\$9,526,632.00	\$0.00
	Platforms Site Clear Cost	\$282,776.00	\$459,616.00	\$905,744.00	\$0.00
	Wells Decom	\$8,825,961.00	\$11,157,006.00	\$14,531,839.00	\$0.00
	Subtotal for Lease	\$16,403,365.00	\$19,811,412.00	\$24,964,215.00	\$1,101,083.00
G01522	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$677,806.00
	Platform Decom	\$1,392,237.00	\$1,842,849.00	\$2,499,528.00	\$0.00
	Platforms Site Clear Cost	\$141,388.00	\$229,808.00	\$452,872.00	\$0.00
	Wells Decom	\$2,537,554.00	\$3,431,244.00	\$4,724,964.00	\$0.00
	Subtotal for Lease	\$4,071,179.00	\$5,503,901.00	\$7,677,364.00	\$677,806.00
G01523	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$1,238,526.00
	Platform Decom	\$7,979,040.00	\$9,963,512.00	\$12,895,017.00	\$0.00
	Platforms Site Clear Cost	\$618,734.00	\$1,021,021.00	\$2,006,568.00	\$0.00
	Wells Decom	\$12,912,207.00	\$17,309,965.00	\$23,679,368.00	\$0.00
	Subtotal for Lease	\$21,509,981.00	\$28,294,498.00	\$38,580,953.00	\$1,238,526.00
G01997	Platform Decom	\$2,260,415.00	\$3,160,577.00	\$4,492,419.00	\$0.00
	Platforms Site Clear Cost	\$335,958.00	\$561,405.00	\$1,100,824.00	\$0.00
	Subtotal for Lease	\$2,596,373.00	\$3,721,982.00	\$5,593,243.00	\$0.00
G02220	Platform Decom	\$3,116,506.00	\$3,566,056.00	\$4,241,219.00	\$0.00
	Platforms Site Clear Cost	\$141,388.00	\$229,808.00	\$452,872.00	\$0.00
	Wells Decom	\$2,878,978.00	\$3,772,667.00	\$5,066,387.00	\$0.00
	Subtotal for Lease	\$6,136,872.00	\$7,568,531.00	\$9,760,478.00	\$0.00
G02311	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$251,905.00
	Platform Decom	\$1,563,518.00	\$2,197,216.00	\$3,140,200.00	\$0.00

Fieldwood BSEE Decommissioning Estimates

Lease	Type	P50	P70	P90	Deterministic
	Platforms Site Clear Cost	\$194,570.00	\$331,597.00	\$647,952.00	\$0.00
	Wells Decom	\$936,948.00	\$1,529,029.00	\$2,386,688.00	\$0.00
	Subtotal for Lease	\$2,695,036.00	\$4,057,842.00	\$6,174,840.00	\$251,905.00
G02549	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$696,808.00
	Platform Decom	\$2,418,370.00	\$2,966,150.00	\$3,774,924.00	\$0.00
	Platforms Site Clear Cost	\$282,776.00	\$459,616.00	\$905,744.00	\$0.00
	Wells Decom	\$9,470,231.00	\$12,199,711.00	\$16,151,139.00	\$0.00
	Subtotal for Lease	\$12,171,377.00	\$15,625,477.00	\$20,831,807.00	\$696,808.00
G02600	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$507,946.00
	Platform Decom	\$2,447,808.00	\$3,346,908.00	\$4,697,234.00	\$0.00
	Platforms Site Clear Cost	\$282,776.00	\$459,616.00	\$905,744.00	\$0.00
	Wells Decom	\$14,957,288.00	\$21,734,505.00	\$31,549,007.00	\$0.00
	Subtotal for Lease	\$17,687,872.00	\$25,541,029.00	\$37,151,985.00	\$507,946.00
G02750	Wells Decom Cost	\$12,907,613.00	\$15,637,089.00	\$19,588,515.00	\$0.00
	Subtotal for Lease	\$12,907,613.00	\$15,637,089.00	\$19,588,515.00	\$0.00
G02754	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$4,784,400.00
	Platform Decom	\$12,099,732.00	\$13,273,784.00	\$15,010,013.00	\$0.00
	Platforms Site Clear Cost	\$424,164.00	\$689,424.00	\$1,358,616.00	\$0.00
	Wells Decom	\$19,320,946.00	\$23,439,367.00	\$29,401,644.00	\$0.00
	Subtotal for Lease	\$31,844,842.00	\$37,402,575.00	\$45,770,273.00	\$4,784,400.00
G22679	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$683,045.00
	Platform Decom	\$1,614,779.00	\$1,888,669.00	\$2,293,056.00	\$0.00
	Platforms Site Clear Cost	\$282,776.00	\$459,616.00	\$905,744.00	\$0.00
	Wells Decom	\$1,592,679.00	\$2,039,523.00	\$2,686,383.00	\$0.00
	Subtotal for Lease	\$3,490,234.00	\$4,387,808.00	\$5,885,183.00	\$683,045.00
G22792	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$2,084,400.00
	Subtotal for Lease	\$0.00	\$0.00	\$0.00	\$2,084,400.00
G02267	Wells Decom	\$0.00	\$0.00	\$0.00	\$575,158.00
	Subtotal for Lease	\$0.00	\$0.00	\$0.00	\$575,158.00
G01524	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$679,882.00
	Platform Decom	\$3,760,536.00	\$4,434,860.00	\$5,447,605.00	\$0.00
	Platforms Site Clear Cost	\$141,388.00	\$229,808.00	\$452,872.00	\$0.00
	Wells Decom	\$2,912,078.00	\$3,891,454.00	\$5,311,240.00	\$0.00
	Subtotal for Lease	\$6,814,002.00	\$8,556,122.00	\$11,211,717.00	\$679,882.00
G01520	Platform Decom	\$5,925,119.00	\$7,275,361.00	\$9,273,124.00	\$0.00
	Platforms Site Clear Cost	\$424,164.00	\$689,424.00	\$1,358,616.00	\$0.00
	Wells Decom	\$5,903,429.00	\$8,011,054.00	\$11,062,456.00	\$0.00
	Subtotal for Lease	\$12,252,712.00	\$15,975,839.00	\$21,694,196.00	\$0.00
G01030	Wells Decom	\$6,135,997.00	\$7,796,775.00	\$10,201,317.00	\$0.00
	Subtotal for Lease	\$6,135,997.00	\$7,796,775.00	\$10,201,317.00	\$0.00
G27918	Wells Decom	\$879,918.00	\$1,103,340.00	\$1,426,770.00	\$0.00
	Subtotal for Lease	\$879,918.00	\$1,103,340.00	\$1,426,770.00	\$0.00
G01217	Wells Decom	\$1,711,590.00	\$2,080,249.00	\$2,614,477.00	\$0.00
	Subtotal for Lease	\$1,711,590.00	\$2,080,249.00	\$2,614,477.00	\$0.00

Fieldwood BSEE Decommissioning Estimates

Lease	Type	P50	P70	P90	Deterministic
G21106	Wells Decom	\$1,808,817.00	\$2,255,662.00	\$2,902,522.00	\$0.00
	Subtotal for Lease	\$1,808,817.00	\$2,255,662.00	\$2,902,522.00	\$0.00
G10594	Wells Decom	\$862,587.00	\$1,086,009.00	\$1,409,440.00	\$0.00
	Subtotal for Lease	\$862,587.00	\$1,086,009.00	\$1,409,440.00	\$0.00
G14456	Pipeline Decom	\$0.00	\$0.00	\$0.00	\$1,117,178.00
	Platform Decom	\$1,411,313.00	\$2,053,499.00	\$2,993,528.00	\$0.00
	Platforms Site Clear Cost	\$247,752.00	\$433,386.00	\$843,032.00	\$0.00
	Wells Decom	\$2,380,779.00	\$3,274,468.00	\$4,568,189.00	\$0.00
	Subtotal for Lease	\$4,039,844.00	\$5,761,353.00	\$8,404,749.00	\$1,117,178.00
TOTALS:		\$223,471,188.00	\$283,156,053.00	\$373,391,460.00	\$16,934,390.00